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STATE OF CALIFORNIA BUSINESS, CONSUMER SERVICES AND HOUSING AGENCY DEPARTMENT OF BUSINESS OVERSIGHT

TO: Inclusive Realty Services Inc. James Brian Blaylock 15820 Whittier Boulevard, Suite A Whittier, CA 90603

DESIST AND REFRAIN ORDER

(For violations of section 25230 of the Corporations Code)

The Commissioner of Business Oversight (Commissioner) finds that:

- 1. At all relevant times, Inclusive Realty Services Inc. (Inclusive Realty) was a corporation registered with the California Secretary of State and maintained an address located at 15820 Whittier Boulevard, Suite A, Whittier, California 90603. Inclusive Realty operated and maintained a website located at http://inclusiverealty.com. Inclusive Realty advertised itself as "a full service real estate brokerage, investment, advisory and property management firm specializing in residential income, multi-family commercial properties primarily in the Los Angeles and Orange County markets."
- 2. At all relevant times, James Brian Blaylock (Blaylock) was the president and founding principle of Inclusive Realty.
- 3. Inclusive Realty and Blaylock sought potential clients through in-person meetings and email solicitations.
- 4. Beginning on or about November 2010, Inclusive Realty and Blaylock began providing discretionary investment advice to California residents in connection with their real estate properties located in California.
- 5. Inclusive Realty and Blaylock received compensation for the investment advisory services they provide to California residents. Inclusive Realty and Blaylock charged at least one California resident a consultation fee of \$ 6,750.00 per month for 12 months.
 - 6. Inclusive Realty and Blaylock represented to at least one California resident they will

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invest the funds into various real estate opportunities. At least one California resident gave money to Inclusive Realty and Blaylock to invest in real estate.

Under California Corporations Code section 25230, it is unlawful to conduct business as an investment adviser in this state unless the investment adviser has first applied for and secured from the Commissioner a certificate authorizing the investment adviser to do so, or unless the investment adviser is exempt. Inclusive Realty and Blaylock do not have a valid investment adviser certificate issued by the Commissioner nor have been registered as an investment adviser with the U.S. Securities & Exchange Commission. Inclusive Realty and Blaylock are not exempt from the certification requirement of California Corporations Code section 25230.

Based upon the foregoing findings, the Commissioner is of the opinion that Inclusive Realty Services Inc. and James Brian Blaylock conducted business as an investment adviser in this state without first applying for and securing from the Commissioner a certificate, then in effect, authorizing them to do so, in violation of section 25230 of the Corporate Securities Law of 1968.

Pursuant to section 25532 of the Corporate Securities Law of 1968, Inclusive Realty Services Inc. and James Brian Blaylock are hereby ordered to desist and refrain from conducting business as an investment adviser in the State of California, unless and until he has first applied for and secured from the Commissioner a certificate, then in effect, authorizing him to act as an investment advisor or unless exempt.

This Order is necessary, in the public interest, for the protection of investors and consistent with the purposes, policies, and provisions of the Corporate Securities Law of 1968.

Dated: January 2, 2018	JAN LYNN OWEN
Los Angeles, CA	Commissioner of Business Oversight
	By:
	MARY ANN SMITH
	Deputy Commissioner
	Enforcement Division